

SEMENZA KIRCHER RICKARD  
10161 Park Run Drive, Suite 150  
Las Vegas, Nevada 89145  
Telephone: (702) 835-6803

Lawrence J. Semenza, III, Esq., Bar No. 7174  
Email: ljs@skrlawyers.com  
Katie L. Cannata, Esq., Bar No. 14848  
Email: klc@skrlawyers.com  
SEMENZA KIRCHER RICKARD  
10161 Park Run Drive, Suite 150  
Las Vegas, Nevada 89145  
Telephone: (702) 835-6803  
Facsimile: (702) 920-8669  
*Attorneys for Defendant/Counterclaimant  
MGM Grand Hotel, LLC and Defendant  
MGM Resorts International*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

DWIGHT MANLEY,

Plaintiff,

v.

MGM RESORTS INTERNATIONAL; MGM  
GRAND HOTEL, LLC,

Defendants.

MGM GRAND HOTEL, LLC, a Nevada  
limited liability company,

Counterclaimant,

v.

DWIGHT MANLEY, an individual,

Counter-Defendant.

Case No. 2:22-cv-01906-MMD-DJA

**STIPULATION AND ORDER TO  
EXTEND BRIEFING SCHEDULE ON  
PLAINTIFF'S MOTION TO COMPEL  
[ECF No. 35]**

**(Second Request)**

Pursuant to LR 7-1, LR IA 6-1, and LR IA 6-2, Plaintiff/Counterclaimant Dwight Manley ("Plaintiff"), Defendant/Counterclaimant MGM Grand Hotel, LLC and Defendant MGM Resorts International (together, "Defendants"), hereby submit this Stipulation to Extend Briefing Schedule

SEMENZA KIRCHER RICKARD  
10161 Park Run Drive, Suite 150  
Las Vegas, Nevada 89145  
Telephone: (702) 835-6803

1 on Plaintiff's Motion to Compel (ECF #35). This is the parties' second request. As set forth  
2 below, the parties have made progress in their attempts to resolve the discovery dispute raised in  
3 Plaintiff's Motion, and therefore request an additional two (2) week extension of the briefing  
4 schedule.

5 1. On August 16, 2023, Plaintiff filed his Motion to Compel (the "Motion"). (ECF  
6 No. 35.) Specifically, Plaintiff moves to compel Defendants' responses to two (2) of his Requests  
7 for Production of Documents – Request Nos. 15 and 16. (*Id.*)

8 2. On August 23, 2023, the Court set a hearing on the Motion for September 26, 2023.  
9 (ECF No. 36.)

10 3. On September 1, 2023, the parties filed their first stipulation to extend the briefing  
11 schedule on Plaintiff's Motion and to continue the September 26, 2023 hearing. (ECF No. 37.)  
12 That same day, the Court granted the parties' stipulation and reset the hearing on Plaintiff's Motion  
13 for October 20, 2023 at 10:00 a.m. (ECF No. 39.) Pursuant to that Order, Defendants' Response  
14 to the Motion is currently due on September 13, 2023, and Plaintiff's Reply is due on September  
15 20, 2023.

16 4. The parties have made progress in their efforts to resolve the instant discovery  
17 dispute. On September 12, 2023, Defendants served a supplemental document production, as well  
18 as supplemental responses to Plaintiff's Requests for Production Nos. 15 and 16, which  
19 Defendants believe provide the information sought by Plaintiff.

20 5. Counsel for Plaintiff requires additional time to review the foregoing supplemental  
21 responses and confer with his client for purposes of determining whether the information provided  
22 is sufficient to resolve this dispute. Accordingly, the parties hereby stipulate and agree to extend  
23 the deadline for Defendants' Response by two (2) weeks, up to and including September 27, 2023.  
24 The parties further stipulate and agree that Plaintiff's Reply brief shall be due on October 4, 2023,  
25 pursuant to LR 7-2.

26 6. Should the parties successfully resolve the discovery dispute regarding Plaintiff's  
27 Request for Production Nos. 15 and 16, they will promptly notify the Court of the same and  
28 request that the October 20, 2023 hearing be vacated.

This Stipulation is not made for the purpose of undue delay and is without prejudice to or waiver of any parties' rights and arguments with respect to the aforementioned Motion.

Dated this 13th day of September 2023.

Dated this 13th day of September 2023.

By: /s/ Jason D. Smith

Nicholas Santoro, Esq. (NV Bar No. 532)

Jason D. Smith, Esq. (NV Bar No. 9691)

HOLLEY DRIGGS

300 S. Fourth Street, Suite 1600

Las Vegas, Nevada 89101

Tel.: (702) 791-0308 / Fax: (702) 791-1912

Email: [nsantoro@nevadafirm.com](mailto:nsantoro@nevadafirm.com)

[jsmith@nevadafirm.com](mailto:jsmith@nevadafirm.com)

*Attorneys for Plaintiff/ Counter-Defendant  
Dwight Manley*

By: /s/ Katie L. Cannata

Lawrence J. Semenza, III, Esq. (NV Bar No. 7174)

Katie L. Cannata, Esq. (NV Bar No. 14848)

SEMENZA KIRCHER RICKARD

10161 Park Run Drive, Suite 150

Las Vegas, Nevada 89145

Tel.: (702) 835-6803 / Fax: (702) 920-8669

Email: [ljs@skrlawyers.com](mailto:ljs@skrlawyers.com)

[klc@skrlawyers.com](mailto:klc@skrlawyers.com)

*Attorneys for Defendant/Counterclaimant MGM  
Grand Hotel, LLC and Defendant MGM Resort  
International*

**IT IS SO ORDERED.**



United States Magistrate Judge

DATED: 9/14/2023

SEMENZA KIRCHER RICKARD  
10161 Park Run Drive, Suite 150  
Las Vegas, Nevada 89145  
Telephone: (702) 835-6803